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R10-14-A-001

January 21, 2014

Environmental Management Support, Inc. Attention: Mr. Don West 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910

**Subject:** Linn County Proposal for Site-Specific Brownfields Assessment Grant Former Wood Product Manufacturing and Aggregate Mining Site Sweet Home, Oregon

#### Dear Mr. West:

Linn County is pleased to provide you with the attached proposal for a site-specific brownfields assessment grant for a former Wood Products Manufacturing and Aggregate Mining Site located within the limits of the City of Sweet Home in Linn County, Oregon. The site is 400 acres in size, and was formerly occupied by a saw mill and plywood mill employing more than 400 people, and a large-scale aggregate mining operation. Operations at the site ended in the early 1990s. The City of Sweet Home has yet to recover from the closure of these facilities, and the community continues to experience an inordinate amount of poverty.

Linn County acquired the property through tax foreclosure in December 2011. The prior owner put significant time and effort into planning for a planned community and received approval from the City of Sweet Home for a master plan for planned development named Santiam River Club before declaring bankruptcy in 2010. The County aspires to conduct sufficient environmental site assessment at the property to allay potential project partner concerns regarding the environmental condition of the property.

### a. Applicant Identification:

Linn County 300 SW 4th Avenue, Room 115 Albany, OR 97321

b. <u>DUNS Number</u>: 055977508

### c. Funding Requested:

i. Grant Type: Site-Specific Assessment

ii. Federal Funds Requested: \$350,000

iii. Contamination: \$200,000 for petroleum \$150,000 for hazardous substances

A waiver of the standard \$200,000 limit is being requested

iv. Site-specific

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d. Location:

2210 Tamarack Street

Sweet Home, Oregon 97836

e. Site Name:

Former Wood Products Manufacturing and Aggregate Mining Site

f. Contact information for the Project Director and Chief Executive are provided below.

Project Director Rick Partipilo

Phone: 541-967-3821 Facsimile: 541-926-2060 rpartipilo@co.linn.or.us

300 SW 4<sup>th</sup> Avenue SW, Room 115

Albany, Oregon 97321

Chief Executive Roger Nyquist

Phone: 541-967-3825 Facsimile: 541-926-8228 rnyquist@co.linn.or.us

300 SW 4<sup>th</sup> Avenue, Room 201

Albany Oregon 97321

g. Date Submitted:

January 21, 2014

h. Project Period:

September 2014 through September 2017 (3 years)

i. Total Population of Area Addressed by Proposal:

Linn County - 118,360 City of Sweet Home - 9,011

j. Other Factors Checklist: Attached

If you have any questions concerning this proposal, please contact Rick Partipilo, Project Director, at 541-967-3821 ext. 2372.

Sincerely,

Roger Nyquist

Chairman, Linn County Board of Commissioner

Attachment: Other Factors Checklist

c: Susan Morales, EPA Region 10

### NARRATIVE PROPOSAL RANKING CRITERIA

### 1. COWWLNITY NEED

# 1.a. Targeted Community and Brownfields

1.a.i Targeted Community Description - Linn County is a primarily rural county located in western Oregon and covering an area of 2,300 square miles. The approximately eastern half of Linn County is occupied by the Willamette National Forest. The project site (hereafter referred to as "Site") for which we are applying for site-specific brownfield assessment funding is a 400-acre former wood products manufacturing property and adjacent aggregate mining property located within in Sweet Home, Oregon. Since Linn County was first settled in the 1850s, it has been heavily dependent on the timber industry, which has been declining for years, and has been hard-hit by the 2008 recession. Current timber harvest in Oregon is a mere 40% of 1988 harvest levels. These trends have resulted in significant economic and environmental impacts in Linn County. Levels of timber industry employment have declined by more than 50% since 1988. The most recent blow was the shutdown of a scaled-back manufacturing operation on the Site, and the International Paper Mill in Albany (Linn County's largest city), in 2009, which resulted in a loss of 260 jobs. Mill shut-downs also have led to the abandonment of industrial properties across Linn County, creating a variety potential public health issues. These sites often leave a legacy of wood treating chemicals, asbestos and lead paint, and petroleum products.

Linn County is applying for this site-specific assessment grant to address the largest abandoned wood products manufacturing facility in the county, and an adjacent aggregate mining facility, located in Sweet Home, Oregon. Sweet Home has been impacted by the declining timber industry more than any other Linn County city because of its proximity to the Willamette National Forest where timber harvest quantities have plummeted over the last two decades, leading to the loss of many timber industry jobs, and supporting service sectors for timber industry workers in Sweet Home. State and local government in Oregon relies on income taxes more than any other place in the Unites States (44.1% of tax revenue is from income tax), so job losses can dramatically impact communities. With EPA grant funds, the County will collect data that will allow public health concerns associated with the Site to be better understood, and gain a thorough understanding of the environmental condition of the Site, which will pave the way for its redevelopment. Redevelopment will lead to economic development, jobs, and improvements in health that result from reduction in contamination levels and improved socioeconomic status.

1.a.ii Demographic Information - This funding will serve non-urban micro communities that are unable to draw on other sources of funding because of their small population size and financial need (i.e. low income). The population of Sweet Home is 9,011. The unemployment rate, poverty level, and median household income in Sweet Home and Linn County all indicate the tough times that the target community is experiencing. The median household income in Sweet Home is \$37,182, which is a daunting 28% less than the nation. A total of 20% of Sweet Home's population lives in poverty, which is nearly 6% above the national average. In Sweet Home 13.4% of residents over 25 have received a bachelor's degree or higher. This is less than half the rate for Oregon and the nation. According to the Status of Oregon's Children 2011 Report, in 2010, 55% of public school children in Sweet Home were eligible to receive free/reduced price lunches during the school year. Another startling statistic is the median value of owner-occupied housing in Sweet Home. At \$122,092, it is approximately half the state median value of \$232,900. This is an indicator of poor socioeconomic conditions, and results in much lower property taxes per unit. According to Feeding America's Meal Gap study, Linn County is also one of the most food-insecure counties in Oregon, at 19.7% or 21,770 individuals, exceeding both national and state ratings. Nearly one in five Linn County residents use Supplemental Nutrition Assistance Program (SNAP) benefits. These numbers tell a compelling story regarding the current economic and social state of Sweet Home and Linn County. A culmination of factors contribute to the current situation of disinvestment in this community. In addition to high unemployment,

lower than average income levels, and high poverty rates, Sweet Home and Linn County have a small and dwindling tax base to draw upon for funding.

	Sweet Home	Linn County	Oregon	Nation
Population <sup>1</sup>	9,011	118,360	3,831,074	308,745,538
Unemployment	10.4%	9.9%	7.7%	7.0%²
Persons below poverty level <sup>1</sup>	20.0%	15.6%	14.3%	14.3%
Bachelors degree or higher <sup>1</sup>	13.4%	16.1%	29.2%	28.5%
Median Home Value	\$122,0924	184,200	\$232,9004	\$221,8001
Median Household Income <sup>1</sup>	\$37,182	\$45,832	\$49,260	\$51,914

<sup>&</sup>lt;sup>1</sup>Data is from www.census.gov/

1.a.iii Brownfields - Oregon Department of Environmental Quality (DEQ) records indicate there are 153 environmental deanup sites (19 in Sweet Home) and 463 leaking underground storage tank sites (33 in Sweet Home) in Linn County. This list includes gas stations, landfills, auto repair shops, dry cleaners, and wood products manufacturing sites. Sweet Home's wood products heritage is evident in DEQ records as the majority of Sweet Home brownfields are wood product manufacturing sites. As a result of the large number of abandoned wood products manufacturing sites in Sweet Home, many of which are not contained in DEQ records, there is a strong perception amongst city residents that Sweet Home is "dirty" and that it is not a healthy place to raise children. The Site for which we are seeking site-specific assessment funding is the largest brownfield site in all of Linn County. Contaminants found at brownfield sites in Linn County include pesticides, herbicides, lead, asbestos, pentachlorophenol, petroleum products, metals, and volatile and semi-volatile organic compounds. These brownfields present a public health concern, impair livability, inhibit job growth, and reduce tax revenue within Linn County.

1.a.iv Cumulative Environmental Issues - With the loss of local timber industry jobs in the 1980s, Sweet Home involuntarily became a rural commuter community. A majority of the City's working residents are employed outside of the City, largely in nearby Lebanon and Albany. The average travel time to work for someone in Sweet Home is 25.5 minutes, which is higher than the County (22.2 minutes), state (22.1 minutes), and nation (25.2). Because of the lack of jobs in Sweet Home, its residents must travel farther to work, which means more out of pocket expenses go toward travel costs. Sweet Home residents are more likely to spend money in other communities for things such as gas. Distance to a health care provider for Sweet Home residents can be 80 miles or more. The need to travel a significant distance to seek medical care can be a barrier to access, particularly among individuals of low socioeconomic status. Assessment of the Site presents a much needed opportunity to create more jobs for low-income people, improve the standard of living in the community, and reinvest in an area that has suffered from industrial decline. Many of the poorest families in Sweet Home live adjacent to the Site. For example, there are currently two real estate listings for residential properties located very near the Site. One (located at 1859 Ulex St) is listed at \$75,000 and the second (located at 1870 Tamarack St) is listed at \$84,500. This is approximately 36% of the median home value for the US, and 66% of the median home value in Sweet Home. These families have been categorized as a sensitive population as a result of their socioeconomic status. The adolescent children of these families are commonly seen on the Site where exposure to hazardous substances such as asbestos and lead may be occurring. These children are known to fish in the log ponds present on the Site. Petroleum contamination has been documented in a limited area of the log ponds, but the conduction of sediments in these ponds needs further evaluation. It is not known of the fish being consumed by these families contain hazardous substances. Our project includes the application of the

<sup>&</sup>lt;sup>2</sup>Data is from US Bureau of Labor and Statistics

<sup>3</sup>Data is from http://www.bestplaces.net/economy/zip-code/oregon/sweet\_home/97386

<sup>&</sup>lt;sup>4</sup>Data is from http://www.city-data.com

Agency for Toxic Substances and Disease Registry (ATSDR) Action Model, and families in this neighborhood will be specifically targeted by the outreach conducted in implementing the model.

Impacts on Targeted Community - Brownfield sites impact the health and quality of life of residents living nearby. Because of the large size of the Site, and the number of adults and children routinely seen fishing, hunting and playing on or nearby the Site, a significant portion of local residents and recreationists may be at risk for exposure to contaminants present. Potential pathways of exposure to toxic chemicals at and near the Site likely include 1) ingestion and inhalation of wind-blown particulates; 2) direct contact to contaminated surface soils by children who are routinely observed fishing, hunting, and/or playing on the property. Even resident exposure via vapor intrusion from groundwater contamination cannot be ruled-out as groundwater has not been adequately characterized. Residential areas located adjacent to portions of the Site introduce potential exposures to Site contamination. A large mobile home park that houses many of Sweet Home's most vulnerable families is located adjacent to the northwestern corner of the Site. The table below includes statistics for the targeted community, Sweet Home's most vulnerable populations: people living in poverty, children and the elderly. There is a well-established link between socioeconomic status and health. As income increases, people are less likely to die prematurely, and more likely to report better health.

	Sweet Home	Linn County	Oregon	Nation
Persons under 18 years old <sup>1</sup>	25.7%	23.8%	22.3%	23.7%
Persons over 65 years old1	16.7%	15.6%	13.9%	13.3%
Persons below poverty level <sup>1</sup>	20.0%	15.6%	14.3%	14.3%
Infant Mortality rate <sup>2</sup>	Unknown	6.2	4.9	6.0³

The overall health and quality of life of communities is determined by multiple factors. In addition to the

to slowed growth, hearing loss, learning and behavior problems.

presence of contamination in the environment, health is also influenced by income, education, employment opportunity, the transportation environment, housing conditions, violence, access to nutritious food, and medical services. Many of these indicators were addressed in previous sections (see Section 1.a.). Indicators of violence tell a more complete story of community health and wellbeing through the lens of safety and security. One indicator of violence is rate of abuse and neglect. In 2010 the rate of abuse and neglect in Linn County reported among children under the age of 17 was 12.3 per 1000 children. This is nearly double the rate reported statewide of 7.3 per 1,000 children. Food security and access to nutritious food represent additional issues impact to the health of our children. According to the Status of Oregon's Children 2011 Report, in 2010, 55% of public school children in Sweet Home were eliaible to receive free/reduced price lunches during the school year. Children that rely on school lunches for their primary meals are at risk for poor nutrition. Both Sweet Home and Linn County have higher rates of children living in poverty than the state and nation. Children are especially vulnerable to the effects of poverty. Children living in poverty have higher risks of injury-related morbidity and mortality, less access to health care, and higher risks of cognitive and developmental delays. Children and developing fetuses are more susceptible to the harmful health effects that can result from environmental contamination. The infant mortality rate in Linn County is higher than rates reported at the state and national levels. Heavy metals, including lead, is known to be present in paint found on abandoned buildings at the Site. Lead poisoning in children can lead

The age breakdown for Linn County indicates 15.9% of our residents are over age 65; this is higher than the state average of 13.5% (source: census.gov). The elderly and persons with existing health conditions are also considered vulnerable populations. The elderly represent a community with unique challenges and

<sup>&</sup>lt;sup>1</sup>Data from the 2010 U.S. Census data and is available at www.census.gov

<sup>&</sup>lt;sup>2</sup>Data is from the Oregon Health Department. Infant mortality rates are per 1,000 live births (2010)

<sup>&</sup>lt;sup>3</sup>Data is from the CIA World Factbook Infant mortality rates are per 1,000 live births (2012)

health needs when compared to children or younger adults. Like children, it is also important to Sweet Home and Linn County to consider the unique needs and influences on health that make our elderly population more vulnerable and sensitive. Our elderly population's ability to respond to physiological challenges presented by exposures to environmental contaminants is limited. Similar to the sensitivities discussed for children, elderly have unique considerations. As we age, our bodies become less efficient at metabolizing and eliminating chemicals from the body.

The data on health determinants presented thus far, combined with risks from the potential exposure to contaminants present at the Site result in a disproportionate impact on our target community. Considering our sensitive populations during the planning and assessment activities for the Site ensures that their unique needs will be considered in redevelopment decisions for the Site. Our plans for community engagement and partnerships to engage with traditionally underrepresented populations are intentional to create positive impacts for our targeted community.

- Financial Need Linn County knows the many benefits, both economic and social, that will be seen from assessing, deaning-up, and redeveloping the Site but have no funds to complete these tasks. Because the previous owner did not have the financial means to pay its property taxes, Linn County acquired the Site through tax foredosure. The County needs additional funds to complete environmental assessment work, assess health risks associated with toxins identified, and complete cleanup planning. Economic Conditions - Linn County's 2013-2014 budget included cuts of 7.74 full time equivalent positions. These are in addition to 2012-2013 budget cuts of 44.25 full-time equivalent positions, a staffing reduction of 8% over 2 years. The current budget includes no major capital improvement projects. Linn County's unemployment rate is (9.9%), which is 2.2% higher than Oregon, and 2.9% higher than the national average. Between 2008 and 2012, Linn County experienced an 8.7% decline in nonfarm employment. One of the hardest hit employment sectors was manufacturing, which experienced a 16.2% decline (source: Oregon Employment Department). Because of Oregon's strong dependence on income tax revenue, this loss of private sector jobs resulted in a domino effect on local government due to income tax revenue decreases (with no sales tax, Oregon is more dependent on income taxes than any other state in the US). A total of 600 local government jobs were lost between 2008 and 2012. As a subset of Linn County, economic conditions are even worse in Sweet Home, with an unemployment rate of 10.4%. High local unemployment has had a significant negative impact on tax revenues available to Linn County and Sweet Home and a long list of socioeconomic indicators.
- 1.c.ii Economic Effects of Brownfields The US Census Bureau 2012 American Community Survey places Oregon's median household income at \$50,036, Linn County's median household income at \$47,129, median household income in census tract 304.02 (immediately east of Clark Mill Rd. and the subject property) at \$45,428, and the median household income of census tract 304.01 (immediately west of Clark Mill Rd. and includes the subject property) at \$34,844. These data demonstrate the impact that the brownfield we are seeking funding to assess has had on the micro-economy in its shadow.

A brownfield study completed by the City of Portland in December 2012 indicated 34 jobs and \$44,000 in additional annual tax revenue for every acre of commercial/industrial brownfield redevelopment. This analysis clearly demonstrates the economic effects of brownfiels as a lost opportunity cost. The job creation rate from the Portland Study is considered applicable throughout Oregon. The tax revenue rate may vary slightly throughout Oregon based on local property tax rates. Using the same rates calculated for the Portland Study, and assuming that approximately 20 acres of the former wood products manufacturing portion of the Site were to be commercially or industrially redeveloped indicates the creation of 680 jobs, and the generation of \$880,000 in annual tax revenues. Clearly this would have a substantial positive impact on the Sweet Home economy. Based upon our vision for the property (a mix of residential and commercial development on the former wood products manufacturing portion of the Site and open

space/park development on the former gravel mine portion of the Site), we believe this estimate of the economic effect of redevelopment of the Site to be accurate.

# 2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

### 2.a. Project Description

2a.i Project Description and Consistency with Redevelopment Plans - Our brownfield project includes a robust community engagement strategy, assessment activities, the evaluation of human health and environmental risks associated with contamination identified, as well as remedial planning. The completion of these steps is necessary to realize the community's well developed vision for the Site. Gaining a sufficient understanding of Site's environmental conditions is essential to allay the fears of potential project partners so that the County can advance redevelopment of the property. Significant master planning previously was completed for the Site and adjoining property. The plan called for the development of the Santiam River Club planned community. The plan included 1,575 units of housing, hotels, restaurants, and retail on approximately 50 acres, and 240 acres of parks and natural areas. The parks and natural areas were to be located on the adjacent former aggregate mining portion of the Site. This plan was approved by the Sweet Home planning commission, and supported by Linn County. The 2008 recession led to financial difficulties for the developer, and the project never got off the ground. Redevelopment will spur economic growth and benefit Sweet Home and Linn County by eliminating safety and public health concerns, creating badly needed local family-wage jobs, increasing City and County tax revenues, and bringing the improvements in health that are associated with improved socioeconomic status.

The County has partnered with the Sweet Home All Lands Collaborative (SHALC), a diverse group of local public and private sector leaders engaged in collaborative efforts for economic development, forest and riparian health, recreation, quality of life, and improvements to public health. SHALC is a primary partner in the Federal Lands Livability Initiative effort to support the City of Sweet Home as a Gateway Community to the Willamette National Forest and the recreational opportunities that it affords. The Site has a prominent role in City of Sweet Home and SHALC plans for economic development and quality of life enhancements. The County fully supports this vision of the Site's role in the future of the Sweet Home area

Following the completion of Site assessment activities, Linn County will reach out to prospective partners and seek investment in the property. All land use actions required to move forward with the planned community concept are in place. Linn County is considering several option to attract partners in the project. One option would be to solicit proposals from master developers. Linn County could evaluate the experience and qualifications of proposers and select the developer that best captures our vision for the property. We expect that development of the property will move forward as a public/private partnership. Linn County will leverage the value of the property in order to obtain from prospective developers a commitment to include parks and open space and low income housing in the project. In other words, we are willing to sell the property at a price below market value if and agreement is obtained from the purchaser to include desired amenities.

2.a.ii Project Management Approach - The project will be managed by Rick Partipilo with the Linn County Department of Health Services. As project manager, Mr. Partipilo will be responsible for EPA quarterly reporting, work plan preparation following project award, contractor procurement, and oversight of the selected contractor. Work plan preparation will be completed within 3 months or project award. The work plan will describe a work scope and schedule for execution of the project consistent with this grant application and the 3-year grant performance period. Contractor procurement will be completed in accordance with County procurement policies and 40CFR Part 31 within 4 months of execution of the Cooperative Agreement for the project. Only contractors with a proven track record of completing EPA grant-funded projects on time and on budget will be considered. Mr. Partipilo will work closely with the

contractor selected to assure the successful and timely completion of the project. Access to the property will not be an issue as it is owned by the entity applying for grant funding (Linn County).

**2.a.iii** Existing Site Conditions - Only very limited assessment has been conducted on this 400-acre property. The magnitude of contamination is not well understood, but based upon the decades of industrial use of the property, we fear the worst. In the limited areas assessed to date, significant contamination included wood treating chemicals and petroleum hydrocarbons have been identified. Samples collected in the former sawmill spray booth area indicate that a release of pentachlorophenol has impacted surface and shallow subsurface soils. Groundwater sampling has indicated that this particular pentachlorophenol release has not impacted groundwater. In 2006, 459 tons of pentachlorophenol-containing soil was excavated and transported to the Coffin Butte Landfill for disposal. Final soil samples documented that pentachlorophenol remains in site soils. Log pond sediment samples, and a soil sample collected in the former debarker area, have indicated that high levels of heavy oil-range petroleum hydrocarbons are present. These activities were funded by a previous property owner. Despite the previous sampling described above, no environmental assessment has been completed across the majority of the Site. DEQ has recommended that eight more areas at the Site be evaluated as summarized in the table below.

	SITE AREAS RECOMMENDED FOR TESTING BY THE DEQ		
-			
1.	<ol> <li>Pentachlorophenol dip tank area</li> <li>Diesel aboveground storage tank area</li> </ol>		
2.	Regulated building materials in Site buildings	6. Log storage decks	
3.	<ol> <li>Plywood mill storage tank areas #1 and #2</li> <li>Log scaling area aboveground tank area</li> </ol>		
4.	Plywood mill hydraulic shed area	8. Shop area	

Based upon our current understanding of Site conditions, derived largely from the assessment work completed to date, the County has developed a scope of work for assessment activities at the Site. The scope of work will include the following:

- conducting additional research regarding historical use of hazardous substances and petroleum;
- engaging community members living near the Site, including vulnerable populations and local
  organizations that provide services to vulnerable populations to understand community concerns, and
  engage residents in plans to assess threats to public health, assessment activities, potential remedial
  actions, and the process of redevelopment of the Site;
- producing a quality assurance project plan and sampling and analysis plan;
- · conducting site assessment activities in each of the areas of concern listed above;
- completing risk assessment in areas where petroleum or hazardous substances are detected to evaluate whether concentrations pose a risk to the environment or the public; and
- conducting remedial planning for areas of the Site where unacceptable risk is identified.

The County plans to utilize DEQ's Voluntary Cleanup Program to facilitate regulatory oversight of assessment activities and in the end provide a mechanism for regulatory closure of Site environmental issues. The County has met with the DEQ, and DEQ believes going through the Voluntary Cleanup Program is the best route to obtain DEQ oversight and involvement. The County has discussed the site assessment approach described above with the DEQ. DEQ has endorsed the approach, and has indicated that it is willing to work with the County in investigating the Site (refer to DEQ letter of support provided).

# 2.b. Task Description and Budget Table

#### 2.b.i Task Description

General Programmatic — Programmatic costs, including County staff time for procuring contractors and general grant oversight and reporting, will be provided as in "in-kind" contribution to the project. The estimated value of this "in-kind" contribution is \$24,000 (400 hours at a fully loaded labor rate of \$60/hr). Travel cost to cover expenses for one County staff member to attend two brownfield conferences is \$3,500.

Community Engagement - County staff will participate in public meetings, and assist with the development of a community outreach plan. Costs associated with County participation in this task will be provided as an in-kind contribution as described above. The work scope for contractor community engagement will include 1) facilitation of public meetings, 2) development of fact sheets, website language, and other materials for public outreach and education, and 3) implementation of the ATSDR Action Model. Contractual costs are estimated at (\$15,000 each [120 hours at \$100/hour plus \$3,000 for travel and meeting material expenses] for petroleum and hazardous substances). The County plans to procure a contract with the RARE program, utilizing Laura Goodrich (current RARE intem in Sweet Home) to lead community outreach efforts. Our community engagement budget also includes time for environmental consultant participation in community meetings. As a result of planned community engagement, the local business community and local government will continue to be fully engaged in the redevelopment efforts related to this Site.

<u>Assessment</u> – Petroleum and hazardous substances assessment tasks are detailed below. <u>Petroleum Assessment Tasks and Budgets</u>

- \$5,000 for developing a quality assurance project plan and two sampling and analysis plans (up to four assessment phases are anticipated). This cost (totaling \$10,000) is split 50-50 with the same task under hazardous substance assessment below.
- \$135,750 for petroleum assessment field activities in areas 3, 4, 5, 6, and 7 listed in Section 2(a)(iii) above. This includes the following subcomponents: an estimated 150 contractor hours at \$125/hour (based upon an assumption of 3 days field work in each area) totaling \$18,250; 15 days of drilling services at an average cost of \$3,500/day, totaling \$52,500; laboratory testing totaling \$50,000; and \$15,000 in other miscellaneous expenses (utility locating services, investigation-derived waste disposal, equipment rental, etc.).
- \$20,000 for reporting, including risk screening (160 contractor hours at \$125/hr).
- \$5,000 for DEQ voluntary cleanup program assistance

# Hazardous Substance Assessment Tasks and Budgets

- \$5,000 for developing a quality assurance project plan and two sampling and analysis plans. This cost (totaling \$10,000) is split 50-50 with the same task under petroleum assessment above.
- \$93,250 for hazardous substance assessment activities in areas 1, 2, and 8 listed in Section 2(a)(iii) above. This includes the following subcomponents: an estimated 90 contractor hours at \$125/hour (based upon an assumption of 3 days field work in each area) totaling \$11,250; 9 days of drilling services at an average cost of \$3,500/day, totaling \$31,500; laboratory testing totaling \$37,500; and \$13,000 in other miscellaneous expenses (utility locating services, investigation-derived waste disposal, equipment rental, etc.).
- \$12,500 for reporting, including risk screening (100 contractor hours at \$125/hr).
- \$5,000 for DEQ voluntary cleanup program assistance

Remedial Planning - Petroleum and hazardous substance Remedial planning tasks are provided below.

- <u>Petroleum Remediation Planning Tasks</u> \$12,500 for remedial planning (100 contractor hours at \$125/hr), including the preparation of an Analysis of Brownfields Cleanup Alternatives or remedial plan for areas that risk screening indicates may warrant cleanup.
- <u>Hazardous Substance Remediation Planning Tasks</u> \$12,500 for remedial planning (100 contractor hours at \$125/hr), including the preparation of an Analysis of Brownfields Cleanup Alternatives or remedial plan for areas that risk screening indicates may warrant cleanup.

**2.b.ii Budget Tables -** The budget for the project includes funding for programmatic tasks, community engagement, assessment, and remedial planning. A budget for both petroleum and hazardous substance assessment is being requested. This is reflected in the budget breakdown provided in the two tables below.

Because of the size of the Site (400 acres) and the significant number of areas of concern, a waiver of the \$200,000 funding limit is requested. Justification for this waiver is detailed in Attachment E.

Budget	Petroleum Project Tasks				
Categories	General Programmatic	Community Engagement	Assessment	Remedial Planning	Total
Travel <sup>1</sup>	\$1,750				\$1,750
Contractual <sup>2</sup>	\$5,000	\$15,000	\$165,750	\$12,500	\$198,250
Total	\$6,750	\$15,000	\$165,250	\$12,500	\$200,000

<sup>1</sup> Expenses for attendance of a regional or national brownfields conference by one Linn County staff.

<sup>2</sup>Linn County will comply with the procurement procedures contained in 40 CFR 31,36.

Budget	Hazardous Substance Project Tasks				
		Assessment	Remedial Planning	Total	
Travel <sup>1</sup>	\$1,750				\$1,750
Contractual <sup>2</sup>	\$5,000	\$15,000	\$115,750	\$12,500	\$148,250
Total	\$6,750	\$15,000	\$115,750	\$12,500	\$150,000

<sup>1</sup> Expenses for attendance of regional or national brownfields conference by one Linn County staff.

- **2.c Ability to Leverage** Linn County has identified numerous specific items leveraged for this project. Each is briefly described below, and leveraging letters are provided in Attachment D.
- Linn County conducted a Phase I and II ESA at the former aggregate mining property at a cost of approximately \$30,000 (\$24,000 in contractual costs and \$6,000 [100 hours at 60/hr] in labor to manage the work. Linn County was able to leverage this assessment work to obtain a grant from Business Oregon in Fall 2013 to complete environmental cleanup on the former gravel quarry portion of the Site. Grant funds received totaled \$60,000, and were used to complete cleanup in several areas on the Site.
- Sweet Home has secured a Resource Assistance for Rural Environments (RARE) 2013/2014 placement (Laura Goodrich). RARE is an AmeriCorps program administered through the University of Oregon's Community Service Center. The mission of RARE is to increase the capacity of rural Oregon communities to improve their economic, social, and environmental conditions through the assistance of trained graduate-level members who live and work in communities for 11 months.
- Linn County has garnered the participation of the Oregon Health Authority Public Health Division (OHA-PHD), as detailed in a leveraging letter included in Attachment D. Training and technical assistance will be provided to Linn County by OHA-PHD under a cooperative agreement provided by the ATSDR. This training is not reflected in the budget for this project. Linn County and RARE intern Laura Goodrich will use the ATSDR Action Model process to ensure that the disenfranchised population (includes disadvantaged, underserved and low income members of the community) has a voice in the local redevelopment decision making processes. For example, RARE staff will co-facilitate this effort and use the Action Model outcomes to inform development decisions taken by the City of Sweet Home.
- The County plans to provide leveraged funds by providing the in-kind services of Mr. Rick Partipilo,
   Environmental Health Program Manager. His time will not be charged to the grant and instead the County
   will pay his cost. It is anticipated that over its life, Mr. Partipilo will spend 400 hours managing the grant.
   At a fully loaded labor rate of \$60/hour, this represents an in-kind contribution of \$24,000.

If additional assessment is necessary, the following funding sources may be accessed and would be pursued based on specific situations.

 EPA Targeted Brownfields Assessments. Linn County has submitted an application to EPA Region 10 for completion of a targeted brownfield assessment of the Site.

<sup>&</sup>lt;sup>2</sup>Linn County will comply with the procurement procedures contained in 40 CFR 31,36.

 Economic Development Partners. We will collaborate with other economic development partners to determine if Economic Development Administration, HUD Community Development Block Grant and/or U.S. Department of Agriculture funds can be obtained for assessment and deanup.

If cleanup is needed following assessment, the following funding sources will be evaluated:

- Oregon Brownfields Redevelopment Fund. This fund is managed by the Business Oregon and offers loans and grants for cleanup on eligible brownfields sites. It is funded by the sale of state lottery revenue bonds. Linn County already has received \$60,000 in grant funding through this program, and has a commitment for further support.
- Oregon Coalition Brownfields Cleanup Fund. This fund is managed by Business Oregon and provides loans and grants for cleanup on eligible brownfields sites. It is funded through an EPA RLF grant.
- EPA Competitive Cleanup Grant. We would evaluate applying for EPA cleanup grant funding.

# 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

3.a Involving Targeted Community & Other Stakeholders and Communicating Project Progress
Linn County has a long history of community involvement through use of stakeholder groups and advisory
committees. The primary goal of the community involvement part of our assessment grant will be to ensure
that the traditionally disenfranchised members of our targeted community have a voice in the
redevelopment decisions affecting the Site. This effort is intended to complement the efforts already
underway by SHALC.

<u>Community Engagement Plan</u> — We will prepare a plan for community engagement within 3 months of award. We will use the ATSDR Action Model process to engage the disenfranchised members of the community in the decision making process affecting the Site. The City of Sweet Home is supporting this effort through their RARE/AmeriCorps staff position (Laura Goodrich). Laura also is the project coordinator for the Sweet Home All Lands Collaborative (SHALC), the South Santiam Community Forest Corridor Project (SSCFC), and Federal Lands Livability Initiative (FLLI). These projects also include community outreach elements and Laura will co-facilitate the Action Model process with Linn County and OHA-PHD staff. The Action Model outcomes will be shared with SHALC/SSCFC/FLLI decision makers.

Newspaper, Fact Sheets, and Web Page — The County will use the local newspaper, The New Era, our weekly newspaper, to distribute information about the project to the community. We will create press releases to provide to the newspapers and we will invite reporters to public meetings and other events. At the public meetings, the County will distribute fact sheets to help explain the goals and accomplishments of the assessment work and project. The fact sheets will also be placed at City of Sweet Home and Linn County offices. Information about the brownfields assessment and redevelopment project will be placed on the County's website and the City of Sweet Home's website.

<u>Public Meetings</u> — A minimum of four public meetings will be held for this grant. The first public meeting will be held to announce award of the grant and plans to move forward. Two meetings will be held during project implementation. The final meeting will be to describe the findings of the assessment activities. At these meetings, we hope to educate the public about brownfields and to gain an understanding of issues of concern to attendees. In addition, information regarding the progress of the project will be provided during regularly scheduled Linn County commissioner meetings and Sweet Home city council meetings.

<u>Engaging with Traditionally Disenfranchised Community Members</u> - The ATSDR Action Model process will include the following targeted outreach efforts. **Step 1:** In collaboration with the OHA-PHD brownfields group and our Sweet Home area non-profit partners, we will develop and distribute a simple survey to the disenfranchised population in Sweet Home, asking them to identify the issues in their community. **Step 2:** We will host a community meeting to recap the survey results, further brainstorm how development can address the issues and establish priorities. This meeting will be co-facilitated by staff from Linn County

(Rick Partipilo), City of Sweet Home (Laura Goodrich) and OHA-PHD brownfields group (Kari Christensen). Our non-profit partners and their dients will be invited to participate. **Steps 3 & 4:** We will reach out to our network of professional colleagues to help identify the corresponding community health benefits of addressing the identified community issues and the data needed to measure change. We will review the facilitators report with our stakeholder participants and share the report with our SHALC/SSCFC/FLLI partners. As development moves forward, we will report progress to stakeholders. The Linn County Department of Health Services will continue to support the ATSDR Action Model process by integrating it into its ongoing stakeholder process in the Sweet Home area.

- 3.b Partnerships with Government Agencies Linn County has established relationships with multiple government agencies in its efforts to address economic development, environmental, and social equity issues at the Site.
- 3.b.i Partnerships with Local/State/Tribal Environmental and Health Agencies With the brownfields assessment grant we plan to continue and enhance our relationship with state environmental agencies. The DEQ's mission is to protect human health and the environment. Our project is consistent with this mission, and we will be working closely with the DEQ through its voluntary cleanup program to ensure that the project is not in any way counter to the DEQ's mission.

We also have established a partnership with the OHA-PHD, which is committed to providing public health expertise, support and technical assistance to the project. Specifically OHA-PHD will assist Linn County in developing and carrying out a community engagement strategy that ensures that residents historically affected by economic disinvestment, health disparities, and environmental contamination have an opportunity to access and enjoy the benefits from the project. The OHA-PHD Brownfields Initiative is committed to environmental justice; engaging communities to be involved in the process of risk assessment and redevelopment to mitigate health risks and maximize the health benefits that result equitably.

In the spring of 2015, OHA-PHD plans to offer a training session to build capacity at the local level for meaningful involvement of communities impacted by brownfields. This training will include tools and resources for incorporating public health and community concerns into the brownfields redevelopment process. Linn County operates a health clinic in Sweet Home and is a participant in the local social services network serving the vulnerable population. Linn County staff will attend this training and will also invite other key participants in the local social services network to attend the training. The successful track record of OHA-PHD and their willingness to partner on this project enables the leveraging of multiple resources including: health education, training, community engagement, and technical human health risk assessment assistance. Support from OHA-PHD could include assistance in facilitating the following activities: (a) health monitoring plans (including the selection of health indicators to assess livable, sustainable, and equitable development outcomes), (b) the prevention of exposures, (c) implementation of the ATSDR Action Model framework to integrate the local residents in the process of redevelopment for the Site, (d) reflecting community concerns in redevelopment plans, and (e) ensuring that public health activities prioritize work with vulnerable populations. OHA-PHD has provided similar services for two other brownfield projects in Oregon (Cully Park and Linnton Neighborhood) and both projects were deemed a huge success.

3.b.ii Partnerships with Other Federal, State, and Local Government Agencies - Sweet Home is one of four communities identified nationally for participation in the Federal Lands Livability Initiative, which is a initiative of the Federal Lands Livability Workgroup comprised of the Federal Highway Administration, US Fish & Wildlife Service, and the National Park Service. This program works with local government officials, public land managers, and community residents on issues related to local land use, economic development, and nature-based tourism to find a common way forward that fosters community development while promoting public lands and the outdoors.

In October 2012, the governor of Oregon designated the Oregon Solutions Team South Santiam Community Forest Corridor project. This Oregon Solutions project has identified and prioritized projects in the corridor that will improve watershed health and wildlife habitat, promote sustainable forestry practices, protect heritage sites, and enhance recreation and tourism access and use. SHALC is the local body formed to coordinate and implement FLLI and SSCFC initiatives. A letter of support from SHALC is provided in Attachment C.

In the summer of 2013, Linn County received from Business Oregon a \$60,000 grant for environmental cleanup on the former aggregate mining portion of the Site. The funding source for the grant was the Oregon Brownfields Redevelopment Fund. As indicated in the attached letter of support, Business Oregon is committed to providing continued assistance to Linn County for this project.

The City of Sweet Home and Sweet Home Economic Development Group will partner with Linn County in implementing the project. Their primary project responsibilities will be public outreach and assisting in the identification of potential redevelopment partners, respectively.

3.c Partnerships with Community Organizations - The County has a history of working with community-based organizations. The table below lists the principle organizations that will be involved in this project, and in redevelopment of the Site. Letters of support for all of these organizations are included in Appendix C.

	COMMUNITY-BASED ORGANIZATIONS SUPPORTING THIS GRANT			
Organization	Description	Role and Commitment		
SHALC representing more than 30 stakeholder groups Sweet Home Economic Dev.	Promotes economic development, forest and riparian health, recreational opportunities, enhanced quality of life and improvements to community health in the Sweet Home area  Promotes economic development in the Sweet Home area	Information dissemination, assisting in finding prospective purchasers for the Site, and participation in community engagement. Coordination of FLLI and SSCFC efforts for Sweet Home area.  Information dissemination, assisting in finding prospective purchasers for the Site.		
Group		finding prospective purchasers for the Site, and participation in community engagement.		
Willamette Neighborhood Housing Services	Community Housing Development Organization. Largest provider of low- moderate income housing and related services in Sweet Home.	Existing partner with County and other cities in HUD/CDBG housing rehab programs.  Partner with County in community outreach effort to reach disenfranchised community via ATSDR Action Model.		
Boys and Girls Clubs of the Greater Santiam	Enabling young people, especially those from disadvantaged circumstances, to realize their full potential as productive, responsible, and caring citizens.	Information dissemination and community engagement, focused on at-risk youth that may trespass on the Site, and representing vulnerable populations (low-income children).		
United Way of Linn County	United Way receives and distributes donations to 26 community based agencies.	Information dissemination and community engagement representing vulnerable populations (elderly, low-income children.		
Other organizations	Various	As noted in letters of support (Appendix C).		

## 4. PROGRAM BENEFITS

Health and/or Welfare and Environment - We anticipate multiple environmental, social, and public health benefits from assessing, remediating, and redeveloping the Site. Currently, the impact of the Site on public health is not well understood, and is of great concern to local community members who fear the worst. Environmental assessment activities will identify risks to public health. Once identified, the County can take immediate temporary corrective actions to minimize health risks until redevelopment of the property can implement more permanent actions. If exposure to lead is identified as a public health concern, which children are particularly sensitive to, a high priority will be assigned to mitigating these exposures. Another significant concern is whether surface water discharges from the Site's log ponds are transporting toxins to the South Santiam River where the health of recreational users of the river and fish could be impacted. Our hope is that assessment activities conducted at the Site will reveal no significant public health concerns, but until the Site is assessed, the local community will continue to experience a high level of anxiety regarding this issue.

The social benefit that will be seen by revitalizing the Site into a functioning component of our community is a key part of the project. As the old buildings are raised, and new use of the property begins, Sweet Home will feel vibrant again, and the sustainable redevelopment of the area will be a tremendous benefit to the community. Public health agency involvement will build capacity through training and the implementation of the ATSDR Action Model, maximizing community resources so that community members themselves can continue to contribute and make health a part of a well-rounded approach to development and growth. The County will encourage the integration of equitable development principles into the reuse of the Site.

The project will include the creation of 240 acres of new greenspace within Sweet Home. Sweet Home currently has approximately 30 acres of parks/greenspace, and only one park larger than 20 acres. Its parks currently include less than 1,000 feet of South Santiam River frontage. Currently only approximately 3 acres of park per 1,000 people exists in Sweet Home. Our project will increase this statistic by an order of magnitude to 30 acres of park per 1,000 people. Our project will bring the acres per 1,000 people in line with the national standard of 10 acres of park per 1,000 people.

To protect the public, our contractor will be required to prepare a health & safety plan that will protect workers, nearby residents, and sensitive populations from exposure to contamination during assessment activities. Specific procedures will be followed to minimize or eliminate the potential exposure to contamination, including the containerizing of soil cuttings, wastewater generated in decontaminating sampling equipment, contaminated groundwater, and any other investigation-derived wastes generated. We will coordinate with the DEQ and EPA to ensure that appropriate protection is provided for sensitive populations during assessment activities, and require sampling & analysis plans to outline the steps that will be taken to protect sensitive populations.

# 4.b Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

**4.b.i Planning, Policies or Other Tools** - By redeveloping the Site, current infrastructure can be used and extended. It is anticipated that infrastructure needs for redevelopment cannot be met completely by existing infrastructure. System development fees and private developer investment will allow upgrades to current infrastructure to occur. Redevelopment of the Site will also facilitate improved management of stormwater originating from the City of Sweet Home, US Highway 20, and the railroad right of way adjacent to the Site. During demolition of the current on-site buildings, recycling of materials will be encouraged, subject to proper handling of materials that may contain asbestos and lead-based paint. Site structures are known to contain several thousand board feet of lumber and wooden beams that will be recycled. Redevelopment plans include bike paths that will provide an alternative commuting option, and project job creation will reduce average commuting times for Sweet Home residents by creating local jobs. The project will enhance the unique characteristics of Sweet Home and Linn County through investment in healthy,

safe, walkable neighborhoods. Finally, it will increase the quality of life for residents through the enhancement of access to the nearby South Santiam River and Willamette National Forest.

**4.b.ii Example of Past Efforts** - Linn County's partnership with the Willamette Neighborhood Housing Services (a private, nonprofit community development corporation) provides an example of past efforts to integrate livability principles within the target community for our project. The mission of this partnership is to create and preserve quality affordable housing as a means to strengthen our community, provide economic opportunity, and promote community partnerships. We currently have 5 diverse properties in Sweet Home including senior and family apartments, senior duplex-style apartments, and single-family rental homes. Linn County plans to partner with Willamette Neighborhood Housing in incorporating affordable housing into redevelopment of the project property. Adding new more energy efficient stock to our existing inventory is essential to the long-term success of our program.

# 4.c Economic and Non-Economic Benefits (Long Term Benefits)

**4.c.i** Economic, Environmental, and Social Equity Benefits - Numerous economic benefits will be seen by redeveloping the Site. With the substantial decrease in timber industry jobs experienced in Sweet Home, including the dosure of wood products manufacturing facilities located on the Site, a new large project will be a boost to the community and put people back to work. It has been estimated that Site redevelopment would create 680 jobs (see Section 1[c][ii]). Implementation of the Santiam River Club Project or a similar planned community would include construction costs estimated at \$566M. This produces an estimated 809 direct full-time employees, and another 554 indirect and induced full time employees, for a total 1,363 full-time jobs over an eight year period for construction only. An additional 680 employees would be needed to work at the hotel, retail shops, restaurants, and supporting services. Development of the property also will result in increased tax revenues estimated at \$880,000 annually (see Section 1[c][ii]).

The non-economic benefits of this project are nearly as numerous as the economic. Redevelopment plans include abundant green space with recreational opportunities at the Site. Plans include approximately 240 acres of green space, including parks and a nature trail. The project will significantly improve access to the South Santiam River and associated recreational activities such as boating and fishing. Another non-economic benefit is simply assessing and cleaning up the Site. It is currently an eye sore with numerous vacant, dilapidated buildings and drains the resources of our local police who must monitor the Site for trespassers. Public health involvement in this project will assist in capturing the non-economic benefits through the development of social, health, and livability indicators through a collaborative process involving community residents and traditional redevelopment stakeholders.

**4.c.ii** Local Hiring/Procurement - The County does not have any environmental job training programs. Oregon Tradeswoman, Inc., located in Portland, Oregon, received a second round of EPA job-training grant funding in 2012. We will attempt to work with Oregon Tradeswoman directly, or with contractors that employ Oregon Tradeswoman program graduates. We will also make all efforts to link Sweet Home community members to potential employment opportunities associated with our brownfield projects. We will work with Worksource Oregon's Lebanon office to determine if any job seeker has the appropriate qualifications to assist with our brownfield projects. When selecting a contractor to conduct our project, consideration will be given to contractors that are located in close proximity to Sweet Home and that commit to using local subcontractors to the maximum extent possible.

# 5. PROGRAMINATIC CAPABILITY AND PAST PERFORMANCE

<u>5.a</u> <u>Programmatic Capability</u> Linn County has planning, engineering, legal, and other staff with proven experience and expertise to both manage the brownfields assessment grant project and to provide support services necessary to achieve all grant scope, schedule, and budget requirements. The County has assembled a two-person project team with more than 50 years of experience to oversee the project.

Rick Partipilo, Environmental Health Program Manager will act as project manager, and lead Linn County's grant oversight activities. Mr. Partipilo also will be responsible for all EPA reporting. Mr. Partipilo has over 37 years of environmental health experience and has been with the County for more than 30 years. Mr. Partipilo has managed three environmental site assessment projects over the last 5 years, and frequently works with and addresses the public in many forums, including public meetings. Mr. Partipilo has also managed Community Development Block Grants (CDBG) received from various entities. Since 1995, Linn County has received four CDBG grants for housing rehabilitation and one CDBG grant for a community facility. Mr. Partipilo has provided oversight for each of these projects. The community facility grant was for expansion of a Health Clinic in Sweet Home, which Linn County still operates. Currently, Mr. Partipilo is involved in closeout activities for the fourth housing rehabilitation grant, HR105.

Ralph Wyatt is the Linn County Administrative Officer and Budget Director will act as project financial manager. His responsibilities include grant administration and oversight. Mr. Wyatt will be responsible for financial aspects of the project including cost reimbursement requests. Since coming to Linn County, he has been the grant administrator for six CDBG grants: Food Share Warehouse, ABC House, Sweet Home Health Clinic, and three housing rehabilitation grants. He is accustomed to tracking multiple grant effort simultaneously. He has also been responsible for facilities acquisition, construction, and remodeling projects ranging from \$2M to \$20M in size. Ralph has a bachelor's degree in mechanical engineering from Oregon State University and a MBA from University of Southern California. Prior to working for Linn County, Ralph served in various project management capacities for the US military including base civil engineer for Langley Air Force Base. His time working for the military prepared him for his current position because US military contracts are subject to many of the same federal requirements as federal grants.

In the case of employee turnover, we will quickly advertise the job opening. We will look for someone who is experienced in the field and can jump right in to the position. The County will select a qualified environmental professional to assist with community outreach and conduct assessments and deanup planning. We will procure the qualified environmental professional in accordance with 40 CFR 31.36.

	PROPOSED OUTPUTS AND OUTCOMES			
Task Area	Outcomes	Outputs		
Community Outreach	<ul> <li>Number of people engaged in project</li> <li>Number of people engaged in the project representing vulnerable populations</li> <li>Number of meetings held</li> <li>Number of people attending meetings</li> <li>Number of educational materials disseminated</li> </ul>	<ul> <li>Completed Community Outreach and Education Plan</li> <li>Completed health monitoring plan</li> <li>Measurable improvements in community health indicators</li> </ul>		
Site Assessmen t	<ul> <li>Number of risk concerns identified</li> <li>Number of people protected from contamination</li> <li>Number of acres assessed</li> </ul>	Completed qualify assurance project plan     Completed health and safety plan     Completed sampling and analysis plan(s)     Completed assessment report(s)		
Site Redevelop- ment	<ul> <li>Total increase in tax revenue</li> <li>Number of jobs created</li> <li>Amount of leveraged funds</li> <li>Acres of created greenspace</li> </ul>	Number of meetings with developers     Number of state and federal assistance agreements realized		

To measure progress, Mr. Partipilo will track our project outputs and outcomes as we execute community engagement, site assessment, and remedial planning. The table below identifies the proposed outputs and outcomes, recognizing that outputs and outcomes for this grant, as indicated in the grant application

guidelines, will be determined and spelled out in our EPA work plan. Mr. Partipilo will be responsible for reporting and tracking outputs and outcomes. We will report outputs and outcomes in our quarterly reports to EPA and compare our actual accomplishments to the agreed upon outputs and outcomes in our EPA work plan. He will also report progress in EPA's ACRES tracking system.

Recognizing that some of our outputs or outcomes will not be completed during the three-year grant cycle, we will report intermediate outcomes that we achieve during the grant cycle, including the amount of funds leveraged for the revitalization project, the number of jobs created, and the degree to which exposure to contamination is minimized. By keeping track of our brownfields goals and the project outputs and outcomes, we will be able to keep the community better informed of progress and provide EPA the data necessary to demonstrate that funds are being used as intended. If there is a lack of progress toward completing outputs and outcomes, actions will be taken to correct and steer the course of the project.

**5.b** Audit Findings — The County has never received an adverse audit finding from an OMB Circular A-133, the federal, state, tribal, or local government inspector general or similar organization, or U.S. Government Accountability Office. The County has never been required to comply with special "high risk" terms and conditions under agency regulations pursuant to OMB Circular A-102.

# 5c. Past Performance and Accomplishments

5.c.i Currently or Has Ever Received EPA Brownfields Grant - Not applicable.

5.c.ii No Brownfields Grant, But Has Received Federal or Non-Federal Assistance Agreements

1. Purpose and Accomplishments - While the County has never received an EPA brownfields grant, the County has a long history of receiving and managing both federal and non-federal assistance agreements. The summaries below discuss how the County has effectively managed past assistance agreements.

Example Grant #1 - Community Development Block Grant (CDBG) Project #HR105 (\$400,000), for Housing Rehabilitation. Rehabilitation of owner occupied single family residences to HUD standards for low and moderate income families in Linn County. No interest, deferred payment loans, payable upon transfer of property. Program carried out via sub-grant agreement with HUD qualified 501(c)(3) housing services provider, which maintains the loan portfolio and capitalizes the affiliated regional revolving loan fund. Monitoring Report — November 2012.

<u>Example Grant #2</u> - CDBG Project #HR306 (\$300,000), for Housing Rehabilitation: See CDBG Project #HR105. Monitoring Report - February 2005.

<u>Example Grant #3</u> - CDBG Project #99006 (\$500,000), for Housing Rehabilitation: See CDBG Project #HR105. Monitoring Report — September 2002.

2. Compliance with Grant Requirements - The three grant examples listed above demonstrate Linn County's capacity to comply with complex federal grant contract requirements. To carry out the CDBG program for Housing Rehabilitation Linn County formed the Linn County Housing Rehabilitation Partnership ("the Partnership") with seven partner cities. Linn County and each Partner carry out the housing rehabilitation program for each grant award through a sub-grant agreement with a HUD qualified Community Housing Development Organization (CHDO). The grant and sub-grant contracts require compliance monitoring in the following areas: National Objective, Financial Management, Procurement, Environmental Review, Furthering Fair Housing, Program Beneficiaries, Section 504 Accessibility for Individuals with Disabilities, Program Income, and Timely Progress. Linn County and each Partner maintain close communications with the funding entity. The Partnership Board and CHDO meet regularly during the course of each grant contract to discuss progress and resolve any issues that arise. There have been no "Findings" (violations of Federal Law or Special Conditions of the grant contract) in the Monitoring Reports of Linn County's CDBG housing rehabilitation grant projects. Each grant has resulted in rehabilitation of 15 to 20 single-family residences, upgrading them to meet HUD housing standards.

5.c.iii Never Received Any Type of Federal or Non-Federal Assistance Agreements - Not applicable.

# Attachment A

**Threshold Documentation** 

#### THRESHOLD ELEGIBILITY CRITERIA FOR ASSESSMENT GRANT

- **1. Applicant Eligibility:** Linn County is a general purpose unit of local government as defined under 40 CFR Part 31.
- 2. Letter from the State or Tribal Environmental Authority: A letter from the Oregon Department of Environmental Quality acknowledging that Linn County is applying for United States Environmental Protection Agency (EPA) brownfields funding is attached.
- 3. Community Involvement: Linn County will work closely with the City of Sweet Home, the Oregon Health Authority Public Health Division, and the Federal Lands Livability Initiative to inform and involve the community and other stakeholders in the project. Our planned approach to community involvement is described in our narrative proposal, principally in Section 3.
- **4. Site Eligibility and Property Ownership Information:** Linn County is applying for both petroleum and hazardous substance funding.

### Site Eligibility:

- a. Basic Site Information
  - i. Site Name: Former Wood Products Manufacturing and Aggregate Mining Site
  - ii. Address: 2210 Tamarack Street, Sweet Home, Oregon 97836
  - iii. Current Owner: Linn County
- b. Status and History of Contamination at the Site:
  - i. The site is contaminated with petroleum and hazardous substances.
  - ii. Operational History and Current Use of the Site: 160 acres of the site has been used for wood products manufacturing since 1934 including the operation of a plywood mill (1959-1994), and sawmill (1934-1989). From the mid-1990s to 2009, approximately 35 people were employed at the site conducting limited wood products manufacturing. The only current site operation is a small pallet-making business that employs <10 people that is operating in the former Shop Building. The remaining 240 acres of the site was used for an aggregate mining operation for a period of approximately 60 years. Mining operations ended in 2003.
  - iii. Environmental Concerns: On the wood product manufacturing portion of the site, pentachlorophenol in surface soil, subsurface soil and groundwater, and oil-range hydrocarbons in log pond sediments have been detected at concentrations exceeding screening levels. On the aggregate mining portion of the site, petroleum hydrocarbons and arsenic in soil have been detected at concentrations exceeding screening levels. Other areas of environmental concerns yet to be investigated are identified below.

- iv. How the Site Became Contaminated and Nature and Extent: The contamination present at the site is likely from wood products manufacturing and aggregate mining operations. Known operational elements that may be contaminant sources include the following.
  - An area where four above-ground storage tanks (ASTs) used to store
    phenol-formaldehyde resin, caustic soda, and glue wash water, located
    east of the former Plywood Mill Dry End Building.
  - An area where three waste oil ASTs were located, west of the Plywood Mill Dry End Building Shop.
  - An area where two ASTs used to store and dispense diesel, located in the southwest corner of the log scaling area.
  - An area where a diesel AST and dispenser were formerly located east of the former Package Boiler.
  - The area of the former Shop Building, where chlorinated solvents and petroleum products were used.
  - A former asphalt batch plant, where diesel from operations and a release caused by arson in 1998 has impacted soil.
  - Several areas of the former aggregate mining portion of the property, where well water high in arsenic was used.

### c. Sites Ineligible for Funding:

The site is not listed or proposed for listing on the National Priorities List, nor subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA, and not subject to the jurisdiction, custody, or control of the U.S. government.

### d. Sites Requiring a Property-Specific Determination:

The site does not require a property-specific determination.

# **Property Ownership Eligibility:**

- e. CERCLA § 107 Liability: Linn County is not potentially liable for contamination at the Site under CERCLA § 107. Linn County acquired the site involuntarily as a result of property tax delinquency. Linn County is not nor ever was a) an operator of the facility; b) a party that arranged for the treatment or disposal of hazardous substances; or c) a party that accepted hazardous substances for transport to disposal or treatment facilities at the site.
- f. Enforcement or Other Actions: Linn County is not aware of any ongoing or anticipated environmental enforcement or other actions by a regulatory authority related to the site. Linn County is not aware of any orders regarding the responsibility of any party for the contamination or hazardous substances at the site.

# g. Information on Liability and Defenses/Protections Where Applicant Does NOT Own the Site:

Not applicable. Linn County owns the site.

## h. Information on Liability and Defenses/Protections:

- i. Information of the Property Acquisition
  - 1. The site was acquired involuntarily by Linn County as a result of real property tax foreclosure.
  - 2. Linn County acquired the property on December 30, 2010.
  - 3. The party from which Linn County acquired the site was Western States Land Reliance Trust.
  - 4. Linn County is not aware of the County having any familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators, or any other potentially responsible parties.
- ii. Timing and/or Contribution Toward Hazardous Substance Disposal All disposal of hazardous substances at the site occurred before Linn County acquired the site. Linn County has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- iii. Pre-Purchase Inquiry
  Linn County acquired the site involuntarily as a result of real property tax foreclosure.
- iv. Post-Acquisition Uses
  - At the time that Linn County acquired the property, Family Pallet Lumber, LLC was leasing a small portion of the site for a wooden pallet manufacturing operation. Family Pallet operations include the use of dimensional lumber to assemble wooden pallets. Linn County has continued to lease a portion of the site to Family Pallet for the aforementioned use.
  - The City of Sweet Home routes local roadway stormwater through the log ponds present at the site.
- v. Continuing Obligations
  - 1. Linn County is unaware that any continuing releases are occurring at the site.
  - 2. To the best of our knowledge, there is no current threat of a future release at the site.
  - 3. At the request of Linn County, the City of Sweet Home Police Department has agreed to conduct frequent patrols of the site to discourage trespass. Linn County also has erected security fencing around certain derelict buildings in an attempt to prevent entry into the buildings, which is considered a safety hazard.

Linn County is committed to 1) assisting and cooperating with those performing assessment, including providing access to the site, 2) complying with all

information requests and/or administrative subpoenas that have or may be issued in connection with the site, and 3) providing all legally required notices.

#### i. Petroleum Sites:

- i. Current and Immediate Past Owners: The current owner of the site is Linn County. The immediate past owner of the site is Western States Land Reliance Trust, a 501c3 organization.
- ii. Acquisition of the Site: Linn County acquired the site on December 30, 2010 through tax foreclosure. At the time of foreclosure, \$505,000 in taxes dating back to 2004 was owed by Western States Land Reliance Trust.
- iii. No Responsible Party for the Site: To the best of our knowledge, neither Linn County nor Western States Land Reliance Trust has not 1) dispensed or disposed of petroleum or petroleum product contamination at the site, 2) owned the site when any dispensing or disposal of petroleum (by others) took place. The County is unaware of any continuing releases of petroleum or any threatened future releases of petroleum at the site. Therefore, to the best of Linn County's knowledge, the County has taken reasonable steps with regard to the petroleum contamination at the site during its ownership of the site.
- iv. Assessed by a Person Not Potentially Liable: Linn County never dispensed or disposed of petroleum or petroleum product, or exacerbated in any manner the existing petroleum contamination at the site, and has taken reasonable steps with regard to the petroleum contamination at the site.
- v. Relatively Low Risk: The site is of "relatively low risk" compared to other petroleum sites. No petroleum impacted groundwater has been documented. No off-site migration of petroleum has been documented. The site is not receiving or using Leaking Underground Storage Tank trust fund monies.
- vi. Judgments, Orders, or Third Party Suits: Linn County is not identified for the site through either a judgment, order, or third-party suit.
- vii. Subject to RCRA: The site is not subject to any order under section 9003(h) of the Solid Waste Disposal Act.
- viii. Financial Viability of Owner and Most Recent Prior Owner: Linn County is not a responsible party, having acquired the property through tax foreclosure. Western States Land Reliance Trust does not have the financial means to satisfy its obligations under federal or state laws to assess, investigate, or clean up the site. Western States Land Reliance Trust filed for bankruptcy in Linn County (Case #10-65642) on September 17, 2010.

# Attachment B

**Letter From State Environmental Authority** 



Department of Environmental Quality
Hendquarters

Headquarters 811 SW Sixth Avenue Portland, OR 97204-1390 (503) 229-5696 FAX (503) 229-6124

TTY (503) 229-6993

January 21, 2014

Susan Morales U. S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, Suite 900 (ECL-112) Seattle, WA 98101-3140

RE: DEQ Support of Linn County's Community-Wide Assessment Grant Application for Sweet Home

### Dear Susan:

The Oregon Department of Environmental Quality (DEQ) strongly supports Linn County's application for a Community-Wide Brownfields Assessment grant to evaluate the former Sweet Home Mill site, which has both petroleum and hazardous-substance contamination. Linn County considers the sprawling 153-acre site, with at least nine distinctive areas of known or suspected contamination, to be an area-wide project due to its size and the inclusion of some surrounding property. The mill site is abandoned and a community safety hazard. The county owns the property via foreclosure, but cannot afford the work needed to return it to productive uses.

Based on its application, Linn County would use grant funds to build on assessments by previous property owners, as well as evaluate areas that we have identified as needing assessment. Once the contamination has been identified and addressed, the county plans to help the City of Sweet Home implement the city's dream of transforming the site from an industrial past to a recreational and community-enhancing future. Along these lines, the previous owner worked with the city on a planned community with 50 acres for housing, commercial, and retail buildings, and 240 acres for parks and natural areas. Financial difficulties prevented this outcome.

Nevertheless, the city remains hopeful of developing this area for natural/recreational purposes, and with Linn County's involvement is using the project as an opportunity to connect public health, community involvement, and other brownfields stakeholders. In late 2013, the county presented its vision for the mill site at an *Oregon Solutions Livability Initiative* meeting, which has led to a collaborative plan on community engagement. The plan includes engaging local residents to understand their perspectives and issues of concern, identifying community assets and values, and exploring how health, livability, the environment, and the economy can all benefit from site re-use planning. Linn County has agreed to facilitate ATSDR's "Action Model" of community engagement that the Oregon Health Authority (OHA) and DEQ used successfully in two Portland neighborhoods. For its part, OHA will support Linn County via training/ health education, facilitating the Action Model process, and applying its expertise in toxicology, health risk assessment, and related disciplines.

In summary, collaborative planning for re-use of the mill site is underway, but Linn County also needs EPA as a partner to fund the environmental work needed to address past mill operations.

Sincerely,

Mund Wife Wendy Wiles

Administrator, Land Quality Division

# Attachment C

**Letters of Support** 



#### CITY OF SWEET HOME

1140 12th AVENUE SWEET HOME, OREGON 97386 541-367-5128 FAX 541-367-5113

January 20, 2014

Linn County Board of Commissioners P.O. Box 100 Albany, Oregon 97321

RE:

Linn County Proposal for site specific Brownfield's Assessment Grant; former wood products manufacturing site, Sweet Home, Oregon

Dear Commissioners,

The City of Sweet Home strongly supports efforts by Linn County to secure Environmental Protection Agency funding in the form of a site specific Brownfield's Assessment Grant to perform additional environmental evaluation and formulate a remediation plan with the ultimate goal of returning this property to productive use.

While the specific details of the redevelopment of the property remain to be determined at a future date, the community of Sweet Home has, and continues to support efforts to evaluate, reclaim and ultimately return this property to productive use for the benefit of the citizens of Linn County and Sweet Home.

As you know, the City has adopted a master plan for planned development of this property which encompasses a variety of mixed uses. We appreciate the County's acknowledgment of this plan and your ongoing efforts to assess and remediate the mill site and adjacent quarry site. Together these brownfields constitute approximately 400 acres of land which could play a prominent role in the future development of commercial, residential and recreational amenities in the City.

As a Federal Lands Livability Initiative (FLLI) "gateway community," the City of Sweet Home has embarked on a comprehensive review of community needs, issues and opportunities. The ATSDR Action Model for community outreach referenced in the grant application will ensure that the traditionally disenfranchised members of our community, those hardest hit by the economic downturn, have a voice in our planning process. We understand that the proposed grant budget includes funding earmarked for community outreach, and the City remains available and willing to assist the County in this effort as may be beneficial to the successful outcome of this project.

On behalf of the City of Sweet Home,

ames Gourley, Mayor

Craig M. Martin, City Manager

Cc: City Council; WSLRT file



# Linn County Department of Health Services

P.O. Box 100, Albany, OR 97321
Toll Free 1-800-304-7468 TTY /Oregon 1-800-735-2900
www.co.linn.or.us/health

"Working together to promote the health and well-being of all Linn County residents."

January 21, 2014

U.S. Environmental Protection Agency Region 10

Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900

Mailstop: ECL-112 Seattle, WA 98101

Subject:

Linn County Proposal for Site-Specific Brownfields Assessment Grant,

Former Wood product Manufacturing and Aggregate Mining Site,

Sweet Home, Oregon

Dear Ms. Morales:

I am pleased to commit resources of the Linn County Department of Health Services (LCDHS) in support of this grant. LCDHS operates health clinics in Albany, Lebanon, and Sweet Home providing services to the traditionally disenfranchised and other members of the community. We provide program services in the areas of Mental Health, Alcohol and Drug Prevention & Treatment, Developmental Disabilities, Public Health Services, and Environmental Health.

Mr. Rick Partipilo, our Environmental Health Program Manager, will provide "in kind" grant management services estimated at 400 hours over the course of the grant. We will also support the community outreach program by providing an opportunity for the 80 to 100 Sweet Home clients enrolled in our Women, Infants, and Children Nutrition (WIC) program to participate in the ATSDR Action Model process. In addition, selected staff from our Sweet Home clinic will participate in the Action Model process along side of their non-profit social service colleagues from the Sweet Home area.

I believe the ATDSR Action Model process may also have broader application in our ongoing citizen advisory and stakeholder efforts, which are substantial. Traditionally, those efforts have been County wide in focus. The ATSDR Action Model process, with its local geographic focus, promises to yield more granular and detailed local community based information, which will complement the work of our traditional citizen advisory and stakeholder efforts.

Sincerely,

Frank Moore, Health Administrator

rank) Moore

Linn County Health Services

Po Box 100

Albany, OR 97321



January 16, 2014

U.S. Environmental Protection Agency Region 10 Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900 Mailstop: ECL-112

Mailstop: ECL-112 Seattle, WA 98101

RE: Linn County, Oregon - Community-Wide Assessment Grant Proposal

Dear Ms. Morales:

I am writing to express my support on behalf of the Oregon Business Development Department (Business Oregon) for the Community-Wide Assessment Grant being submitted by Linn County (County) for consideration for funding assistance to address concerns regarding environmental contamination associated with the 400-acre former wood products manufacturing site and adjacent aggregate mining property located within the limits of the City of Sweet Home and acquired by the County through tax foreclosure.

A former timber mill town, the City of Sweet Home was especially impacted by the numerous mill closures of the 1970s and 1980s and is still struggling to rebuild its economy. This site is the largest abandoned former industrial property in the County and represents an excellent redevelopment opportunity that would benefit the City of Sweet Home, Linn County and the state. The County's proposal highlights the actions still needed to be undertaken to fully understand the environmental challenges associated with the property and will allow the County to develop a critical baseline of information to ensure that concerns about contamination do not pose a barrier to its productive reuse.

Business Oregon encourages community efforts which result in healthier and more sustainable communities since these efforts ultimately lead to the creation of jobs through the redevelopment of stigmatized properties such as brownfields. Redevelopment of this former wood products manufacturing site is important to not only the City but also to Linn County as they strive to provide their citizens with a clean and healthy environment in which to live. Business Oregon, through its Brownfields Redevelopment Program, is currently providing a \$60,000 grant to the County to assist the County with performing identified cleanup on a portion of the adjacent aggregate mining property. Additional brownfields financing assistance for cleanup is also available if needed. Finally, Business Oregon manages a number of public infrastructure and business development financing programs which are available to the County to assist with redevelopment and marketing of the property.

USEPA's consideration of this proposal for funding will assist the County to build its capacity to address public health safety and compliance issues as it strives to attract, retain and expand businesses within its jurisdiction. I strongly support and sincerely hope that you and your staff will approve funding for this Proposal. Please contact Karen Homolac of my staff at (503) 986-0191 if you have any questions.

Sincerely,

Lynn Schoessler Deputy Director

File Code: 1990

Date: January 21, 2014

Susan Morales□ U.S. Environmental Protection Agency, Region 10 1200 Sixth Avenue, Suite 900 (ECL-112) Seattle, WA 98101-3140

Dear Susan,

The Sweet Home Ranger District (SHRD) of the Willamette National Forest strongly supports Linn County's application for a Community-Wide Brownfields Assessment grant to evaluate the former Willamette Industries/Weyerhaeuser lumber and plywood mill site in the City of Sweet Home. The mill site is presently abandoned and a community safety hazard. The City of Sweet Home has approved a Master Plan for Planned Development of the property; however, the unknown risks of site contamination are a barrier to redevelopment of the site. A future use for the site could involve Linn County Parks creating a park in the area that would also serve as a main trailhead for the future Community Forest Corridor trail that eventually would connect with National Forest trails- about 15 miles up the South Santiam River.

Linn County Parks is a strong partner with the Willamette National Forest as they serve as the concessionaire for our five federal campgrounds and a rustic resort for the past four years. The Sweet Home Ranger District and Linn County Parks are active partners with the City of Sweet Home, the Army Corps of Engineers, the Bureau of Land Management, and the Linn County Commissioners where they have created a vision of a recreation destination area in East Linn County. To fulfill this vision, Brian Carroll, Executive Director of Linn County Parks, has been a key leader in working to create a park and trailhead at the mill site. Recently he and Jon Meier, our recreation planner, were successful in securing National Park Service's assistance to plan the corridor trail through a special program.

As East Linn County evolves into a destination recreation area, we will partner with Linn County in its community outreach effort using the ATSDR Action Model as we intend to create jobs to doing stewardship work in caring our natural resources in the East Linn County. Our intent is to engage more youth, veterans, and disenfranchised members of our community to learn the skills of working in the forestry and recreation industries doing jobs that will help to promote personal and community well-being.

SHRD is also participating in the Federal Lands Livability Initiative with the City of Sweet Home. This endeavor has been undertaken by the Sweet Home All Lands Collaborative, which includes membership of all the partners so far listed in this letter with the addition of the Sweet Home Economic Development Group, Cascade Timber Consulting, the South Santiam Watershed Council, the Sweet Home Trails Alliance, Oregon State University and the University





of Oregon. A key to improving livability in Sweet Home would be to renovate the mill site into a safe open space or a park.

We are pleased to be a strong partner and pledge our support for Linn County to obtain this brownfield assessment opportunity.

Sincerely,

/s/ Cynthia Glick CYNTHIA GLICK Sweet Home District Ranger January 17, 2014

U.S. Environmental Protection Agency Region 10

Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900

Mailstop: ECL-112 Seattle, WA 98101

RE: Linn County Proposal for Site-Specific Brownfields Assessment Grant, Former Wood Product Manufacturing Site, Sweet Home, Oregon

Dear Ms. Morales:

Sweet Home All Lands Collaborative (SHALC) and our project team collaborators would like to express support for the Site-Specific Brownfields Assessment Grant being submitted by Linn County for consideration for funding assistance to address concerns regarding environmental contamination associated with the 153-acre former wood products manufacturing site located within the limits of the City of Sweet Home and acquired by the County through tax foreclosure (hereafter referred to as "Site").

SHALC is a diverse group of local leaders that formed in 2012 to collaboratively coordinate land and watershed management in the Sweet Home area for a variety of benefits including local economic development, forest and riparian health, clean air, a high quality of life, and vibrant recreation. SHALC emerged because many local leaders saw potential benefits to working together across land ownerships to manage forests, restore the South Santiam watershed, contribute to local jobs and businesses, and promote local quality of life.

The site is particularly significant to SHALC and our project team collaborators as it has been slated to be the westernmost anchor for the South Santiam Community Forest Corridor (SSCFC), a catalyst for redevelopment in the city of Sweet Home, and a special place within the heart of the community. SSCFC has received both local and regional attention, as it was formally designated by Governor Kitzhaber in 2012, as an Oregon Solutions project. Since that time, more than 50 individuals representing approximately 30 stakeholder groups (see below stakeholder list) have been working in a collaborative effort to create linkages between Sweet Home, public and private forests, public recreation resources, and the upper portion of the South Santiam River, as well as to find better ways to ensure public access to natural resources, provide opportunities for nature-based and cultural tourism, improve public health, support jobs, and promote natural resource health both along the river and in the entire South Santiam watershed.

SHALC and our project team collaborators also have a vested interest in community livability issues. SHALC is one of the primary partners in the Federal Lands Livability Initiative (FLLI), which is an effort to help America's Gateway Communities access, understand and improve the unique natural assets that make them appealing places to live, work and recreate. Sweet Home was one of four communities in the nation to be selected for the FLLI and in December 2013, an assessment team (representing The Conservation Fund (TCF), FHWA, and the respective state Department of Transportation) visited and evaluated the natural, cultural, physical (infrastructure), commercial, and economic health of the Sweet Home community and surrounding landscape as it relates to livability. More than 70 individuals representing approximately 40 stakeholder groups took part in a four day multi-topic community dialogue.

In 2014, The Conservation Fund will work with the local community and public land partners to develop and deliver a workshop to advance community livability based on the community needs and interests. SHALC will engage in a substantial community outreach effort to document community needs and interests for all members of the Sweet Home community. The ATSTR Action Model will help ensure that we reach all members of the community, including the traditionally disenfranchised. SHALC and our project team collaborators not only

support the County's endeavor but will commit staff time and expertise to partner with Linn County in support of the outreach efforts outlined in their grant application.

Thank you for your consideration of our recommendation.

Sincerely,

Signature:	See Letter of Support from USFS.	Doto	
<b>.</b>	nthia Glick, Willamette National Forest, Sweet Home D	Date: _ District Ra	anger
Signature:	Dan Ityl	Date:	1/17/14
Da	ve Furtwangler, Cascade Timber Consulting Inc., Presid	lent	
-	du upt	_ Date: _	1/17/14
Cra Signature:	Martin, City of Sweet Home, City Manager		1/22/14
	Tucker, Linn County, Commissioner	_Date: _	42117
Signature: _	Brim Parroll	_ Date: _	1/21/14
Dite	in Carroll, Lind County Parks and Recreation, Director		

	Ollaborative – Stakeholder List
Albany Visitors Center	Oregon Parks and Recreation Department
AmeriCorps (R.A.R.E)	Oregon Small Woodlands Association
Boys and Girls Club of Greater Santiam	Oregon Solutions
Build Lebanon Trails	Oregon State University
Bureau of Land Management	Portland State University
Business Oregon	Rocky Mountain Elk Foundation
Cascade Timber Consulting, Inc.	Samaritan Health Services
Cascades West Council of Governors	South Santiam Watershed Council
City of Sweet Home	South Valley Regional Solutions Center
College of Osteopathic Medicine of the Pacific	
Northwest	State of Oregon Historic Preservation Office
Community Health Centers of Benton and Linn	
Counties	Sweet Home Chamber of Commerce
Community Services Consortium	Sweet Home Economic Development Group
Confederated Tribes of the Grand Ronde	Sweet Home Emergency Ministries
Confederated Tribes of the Siletz	Sweet Home Police Department
Confederated Tribes of Warm Springs	Sweet Home School District
Governor's Regional Solutions Team	Sweet Home Trails
Linn County Board of Commissioners	The Conservation Fund
Linn County Parks and Recreation	Travel Oregon
Linn County Sheriff's Office	U.S. Army Corps of Engineers
inn-Benton Community College	U.S. Forest Service
inn-Benton Housing Authority	United Way of Linn County
Vational Park Service	University of Oregon
Dregon Department of Fish and Wildlife	Visit Linn Coalition
Dregon Department of Forestry	Willamette Valley Neighborhood Housing Services
Dregon Department Transportation	Workforce Oregon

# Provisional charter

SWEET HOME ALL-LANDS COLLABORATIVE

### January 2013

\*\*This charter is a provisional document intended to capture the state of agreement and commitment from members of this group at this date. It is a nonbinding statement of commitment to working together in good faith. It may be revised in the future to include additional dimensions or participants as necessary.\*\*

BOLKGroung

The Sweet Home All-Lands Collaborative (SHALC) is a diverse group of local leaders that formed in summer 2012. Its purpose is to collaboratively coordinate land and watershed management in the Sweet Home area for a variety of outcomes including local economic development, forest and riparian health, clean water, a high quality of life, vibrant recreation, and cultural resource protection.

Collaborative commitments

Numerous agencies and local organizations are part of SHALC. These participants all share:

- · A broad vision for the future of the Sweet Home area
- Understanding of and respect for each other's organizations and landownerships, where applicable, and their individual priorities
- Commitment to making their time and resources available to work together, as possible, to achieve the shared vision of SHALC and complete related projects
- Desire to work cooperatively with representatives from diverse interests across the community and outside of the community as may best serve Sweet Home
- Willingness to collectively look for and pursue resources to implement SHALC's vision

CIRROTAL DATER LICENCE FERDIZARS

SHALC is currently coordinated by Emily Jane Davis (University of Oregon, Institute for a Sustainable Environment, Ecosystem Workforce Program) and Eric White (Oregon State University, College of Forestry). These individuals are responsible at this time for organizing meetings, developing workplans and projects that reflect the desires of participants, collaboratively communicating with participants and other stakeholders, and generally identifying and organizing opportunities to deliver on SHALC's vision. This includes participation in the Oregon Solutions

process to explore opportunities for a community forest in the South Santiam watershed.

At this time, SHALC is committed to focusing on specific strategic activities and easily attainable projects. Meetings are held when there is a need to collaboratively discuss strategic planning, e.g., to develop a workplan, or to organize around a specific project. SHALC's co-coordinators deliver a monthly report-out of activities and updates to a broader list of interested parties, and seek to ensure clarity and open communication between participants, other stakeholders, and the broader public.

Portagionis as af romadly 2015 Willamette National Forest, Sweet Home Ranger District Geick Print Cynthia Glick Cascade Timber Consulting. Inc. Print David Frankangle United States Army Corps of Engineers, Portland District, Willamette Valley Office Linn County Commission - Print WILLIAM C TUCKER Linn County Parks & Recreation Print City of Sweet Home Print (RAILT AL MARTIN)

aweet nome Economic Development Gro	up
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Sign J4 (/4	Print Jonathon C Meics
Oregon State University, College of Forest	ry
sign Thomas Mass	Print Thomas Maness
University of Oregon, Institute for a Susta Program	inable Environment, Ecosystem Workforc
Sign Jun A	Print EMILY JANE DANS
South Santiam Watershed Council	
Sign En Martin	Print Ent Hartstein



401 Main Street, Suite D Sweet Home, OR 97386

January 21, 2014

Ms. Susan Morales U.S. Environmental Protection Agency Region 10 1200 Sixth Avenue, Suite 900 Mailstop: ECL-112 Seattle, WA 98101

Dear Ms. Morales:

The Sweet Home Economic Development Group strongly supports Linn County's efforts to assess the contamination on the former Western States Land Reliance Trust property.

We are very concerned about the implications of the former Western States Land Reliance Trust site remaining vacant. This site has been a detriment to our community for many years. An environmental assessment will be a significant step forward toward developing a remedial action plan. Once the site's environmental issues are addressed, we are confident that the property can be returned to productive use allowing it to become an important regional asset.

We will work with Linn County to inform residents and businesses about the project. We will also utilize our resources to support businesses that may be interested in establishing themselves in the area.

Sincerely,

Kevin Strong Board President



257 SW Madison Ave., Suite 113, Corvallis, OR 97333 541.752.7220 • 800.403.0957 • Fax: 541.752.5037 info@w-nhs.org • w-nhs.org

ML-4909 NMLS 260098







January 16, 2014

Susan Morales
U. S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900 (ECL-112)
Seattle, WA 98101-3140

RE: Willamette Neighborhood Housing Services (WNHS) Support for Linn County's Community-Wide Brownfields Assessment Grant Application

Dear Susan Morales:

The WNHS strongly supports Linn County's application for a Community-Wide Brownfields Assessment grant to evaluate the former Willamette Industries/Weyerhaeuser lumber and plywood mill site in the City of Sweet Home. The mill site is presently abandoned and a community safety hazard. The City of Sweet Home has approved a Master Plan for Planned Development of the property; however, the unknown risks of site contamination are a barrier to redevelopment of the site.

WNHS has a long and successful relationship with the Linn County Housing Rehabilitation Partnership as a Sub-grantee carrying out a regional Community Development Block Grant (CDBG) housing rehabilitation program. The Partnership includes Linn County, the City of Sweet Home and six other cities in Linn County. WNHS is a Community Housing Development Organization (CHDO). We develop, own and manage properties in the mid-Willamette valley and we are largest provider of rental housing and home ownership services for low income individuals and families within the City of Sweet Home.

We will partner with Linn County in its community outreach effort using the ATSDR Action Model and we will encourage our tenants to participate. Not only will this effort give voice to traditionally disenfranchised members of the community, it will also provide an opportunity for us to exercise the leadership development program we offer our tenants.

WNHS is also participating in the Federal Lands Livability Initiative with the City of Sweet Home and its gateway community partners.

Linn County's involvement provides another opportunity to connect and leverage Federal, State, local government and non-profit programs and resources in public health, community involvement, livability, and community and economic development, and we are pleased to be a partner.

Thank you for considering this important grant application.

Regards,

Brigetta Olson Deputy Director January 21, 2013



U.S. Environmental Protection Agency Region 10

Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900

Mailstop: ECL-112 Seattle, WA 98101

Dear Ms. Morales:

The Boys & Girls Clubs of the Greater Santiam is dedicated to the creation of an economically vibrant and prosperous East Linn County, where all children thrive and grow to realize their full potential as productive, responsible and caring citizens. We are working toward this vision by providing critical programs, services And opportunities designed to prepare any child for success – in school, work, post-secondary education and life. This vision and mission would be difficult enough if we were operating Clubs in communities experiencing economic growth and lowering unemployment rates, but this is not the case in East Linn County – especially as it pertains to Sweet Home.

Sweet Home has continued to suffer from the loss of industry and opportunity that left vast portions of the community bare and families in need. We were pleased to learn of the City of Sweet Home's application for an EPA Brownfields Assessment Grant and are please to support this application. The Club serves nearly 200 children daily in Sweet Home and as such we are greatly concerned about the impact this visible sign of the community's economic struggle may have.

This grant would provide the community with the means and model necessary to determine the steps appropriate to move ahead in the redevelopment of this property to the great benefit of the community and especially to our most vulnerable population – our children.

With an organizational focus on 1) the academic success of the children we serve and, 2) the economic success of the community, we would be happy to provide in kind support to this endeavor through the facilitation of dialogue with families involved with the Club (over 500 families have children who participate in one manner or another) and also to participate as requested in community wide conversation or other activities.

Determining the path forward will not be easy – we are pleased to see the City of Sweet Home move forward with this grant request. If we can provide additional information or support please don't hesitate to call.

Sincerely.

Executive Director

United Way of Linn County 1127 Hill St SE | PO Box 905 Albany, OR 97321 tel (541) 926-5432

fax (541) 926-0660 www.unitedwayoflinncounty.org



U.S. Environmental Protection Agency Region 10

Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900

Mailstop: ECL-112 Seattle, WA 98101

Greg Roe United Way of Linn County PO Box 905 Albany, OR 97321

Dear Ms. Morales,

The United Way of Linn County would like to offer at letter of support for an EPA Brownfield Assessment Grant to evaluate the former Sweet Home mill site, which the county now owns as a result of tax foreclosure. The site has remained vacant and underutilized for many years. We understand the assessment process is the first step in returning the site to a productive and community enhancing property within Sweet Home.

With its close ties to the timber industry, the Sweet Home community has struggled economically for many years. Because of this economic struggle, the need for social services remains high. The redevelopment of this mill site has the support of the Sweet Home community and carries the promise of future employment opportunities. It would also provide improved social, economic and health opportunities to the citizens of Sweet Home and Linn County.

The United Way has a long standing relationship with Sweet Home and Linn County in collaborating to provide needed social services in Sweet Home. We are confident that strengthening the economic base will help improve the lives of the people we serve. Please contact me if you have any questions at 541-926-5432.

Sincerely,

Greg Roe

United Way of Linn County

### Sweet Home School District No. 55

1920 Long Street Sweet Home, OR 97386-2395

Don Schrader, Superintendent 541-367-7126 + Fax: 541-367-7105 don.schrader@sweethome.k12.or.us



Kevin Strong, Business Manager 541-367-7113 + Fax: 541-367-7104 kevin.strong@sweethome.k12.or.us

January 21, 2014

U.S. Environmental Protection Agency Region 10 Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900 Mailstop: ECL-112 Seattle, WA 98101

Dear Ms. Morales:

As superintendent for the Sweet Home School District, I support Linn County's efforts to assess the contamination on the former Western States Land Reliance Trust property located in Sweet Home, Oregon.

I believe this grant will ultimately help turn the site into a valuable community resource. Redevelopment of this site will also facilitate access to a large natural area along the South Santiam River which includes wetlands and is home to several threatened and endangered species. Such access would allow us to provide continued and improved education opportunities to the students in our school district and students from surrounding districts.

In addition to the environmental and educational benefits, having vacant property developed and contributing to Sweet Home's economy helps our school district in the long run by providing for additional tax revenues.

Thank you for supporting this project.

Sincergly,

Don Schrader Superintendent January 15, 2014

U.S. Environmental Protection Agency Region 10

Attn: Ms. Susan Morales

1200 Sixth Avenue, Suite 900

Mailstop: ECL-112 Seattle, WA 98101

Dear Ms. Morales:

I am writing this letter in support of the application by Linn County for an Environmental Protection Agency Brownfields Assessment Grant. Plans for grant funding would be utilized to complete an environmental assessment of a former Sweet Home, Oregon wood products mill site, which has been identified as being highly contaminated.

This site was obtained by Linn County through the process of property tax foreclosure in 2010. The City of Sweet Home, nor Linn County possess the resources to assess the level of contamination or its disposal. Funding would be used to perform a risk assessment for the site to human health and the environment, as well as implement a strategic action plan to restore the property to full safe and productive use.

As a small, economically struggling rural community, Sweet Home faces a potential current danger to the environment and local citizens' health. The assessment and clean-up of this location would facilitate and support both Sweet Home's and Linn County's economical revitalization plans, as well as helping improve lives and futures of our citizens.

Sincerely,

Cindy L. Rice

Cindy L Rice

Sweet Home Emergency Ministries, Emergency Food Pantry Manager



DAVID FURTWANGLER, CF President

MILTON I. MORAN, JR., Director Sales & Logging Operations BILL MARSHALL, Director Silviculture RICK JONES, Director Surveying & Easements GAYLE GIDDINGS, Director Office Management

3210 HWY. 20 P.O. BOX 446 SWEET HOME, OREGON 97386

January 17, 2014

Telephone 367-2111 Area 541

Fax# 367-2117

US EPA Region 10 Attn: Ms. Susan Morales 1200 Sixth Ave., Suite 900

Mailstop: EXL-112 Seattle, WA 98101

Dear Ms. Morales

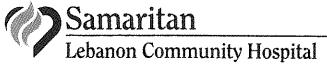
Cascade Timber Consulting strongly supports the County applying for an EPA assessment grant for the former Western States Reliance Land Trust site. These properties have been vacant for many years and have been a blight and eyesore in the community.

We strongly support the County's efforts to further assess the contamination on the property and develop a remedial action plan with the hopes of ultimately returning the property to productive use. We support the efforts of the County that will provide additional jobs in the community and increase the tax base. We also support the community engagement efforts that are part of this process. Our support will be made known in the business community.

As a community member and business owner in the area it's important to have a healthy business climate and opportunity for growth. As such we strongly support the development and re-development of land that will bring increased jobs and investments into the community.

Sincerely,

David Furtwangler



www.samhealth.org

Building healthier communities together

525 N Santiam Highway - PO Box 739 Lebanon, OR 97355 (541) 258-2101 fax (541) 451-7071

January 15, 2014

U.S. Environmental Protection Agency Region 10

Attn: Ms. Susan Morales 1200 Sixth Avenue, Suite 900

Mailstop: ECL-112 Seattle, WA 98101

Dear Ms. Morales,

Samaritan Lebanon Community Hospital is pleased to provide this letter of support for Linn County's application for an EPA Brownfields Assessment Grant to evaluate the former Sweet Home mill site. Our health system provides services in Sweet Home and throughout Linn County. We understand the importance of environmental contributors to individual and community health and strongly support efforts identify potential health threats on this mill site.

Our mission, "Building Healthier Communities Together" reflects the value that Samaritan places on collaborative efforts to strengthen the health of our communities. There is tremendous energy in Sweet Home right now as new initiatives are launched related to economic development, natural resource development and public health. We are excited about these community development activities. The evaluation of the 300-acre mill site is an important component of Sweet Home's renewal initiative. With our strong network in this community, we can provide support in terms of outreach and service if public health issues are identified.

Sincerely,

Marty Cahill,

**Chief Operating Officer** 

# Attachment D

**Documentation Indicating Leveraged Funds** 



### RALPH E. WYATT Administrative Officer

#### LINN COUNTY GENERAL ADMINISTRATION

300 Fourth Avenue, SW (Room 201), PO Box 100, Albany OR 97321-0031 Phone (541) 967-3825 Fax (541) 926-8228

Accounting Payroll, Personnel Services, Data Processing, General Services Facilities, Printing Supplies, Veterans' Services BOARD OF COMMISSIONERS

John K. Lindsey

Roger Nyquist

Will Tucker

January 21, 2014

To Whom It May Concern:

Re: Linn County "In-Kind" Contribution for EPA Brownfield Assessment Grant Application

Linn County has committed and will continue to commit substantial staff time and resources to redevelopment of the former mill site in Sweet Home, which is the subject of our current EPA Brownfield Assessment Grant application.

The acute needs of the Sweet Home community and potential benefits of the grant are great. Because we would like to maximize the benefits of any grant funds awarded, Linn County will not seek compensation or reimbursement from grant funds for our expenses related to administration of the grant should it be awarded.

Please consider this contribution of Linn County staff time and resources as an "in-kind" contribution and part of our grant application. We value this contribution at \$24,000 (400 hours with direct costs of \$60 per hour).

Sincerely,

Ralph Wyatt

Linn County Administrative Officer



January 8, 2014

Linn County Board of County Commissioners c/o Rick Partipilo PO Box 100 Albany, OR 97321 800 NE Oregon St, Ste. 640 Portland, OR 97232 Voice: 971-673-0977

Fax: 971-673-0979 TTY: 971-673-0372

Dear Mr. Partipilo:

The mission of the Oregon Health Authority Public Health Division (OHA-PHD) is to promote health and prevent the leading causes of death, disease, and injury in Oregon. OHA-PHD recognizes that improvements to our built and social environments are critical to accomplishing this mission. The Linn County project establishes a clear plan to assess and improve the environment and socio-economic conditions for Sweet Home residents. We have a history of collaboration with Linn County, providing support to characterize human health risks at the former Western States Reliance Land Trust sties, as well as other sites with potential or known contamination concerns in the County. OHA-PHD supports this application because it will address potential or known contamination in addition to opening up opportunities for local residents to engage in a meaningful way throughout the process. The project also includes endpoints with clear health connections, such as: improving access nature, opportunities for recreation, local living wage jobs, and activities that foster community cohesion and harness local vision.

The Brownfield Initiative and Environmental Health Assessment Program within our Healthy Communities unit at OHA-PHD are comprised of a team of public health professionals committed to provide a range of expertise for this project: from assistance with culturally sensitive community engagement strategies – to providing review of site sampling plans – to characterizing and mitigating human health risks – to distilling technical information so that it is accessible and relevant to targeted populations. OHA-PHD has had success using the Agency for Toxic Substances and Disease Registry (ATSDR) Action Model as a framework for community involvement. The model encourages the project to think broadly about how concerns from the community and other stakeholders can be addressed and local values can be emphasized during the planning, implementation and other brownfield assessment activities described in the proposal. The ATSDR Action Model also integrates data from peer reviewed scientific literature and other sources to connect assessment plans with best practices, and track successful outcomes. We will work closely with Linn County to support activities that carry out the ATSDR Action Model.

We look forward to working with the Linn County, and the partners identified within this application to create health promoting opportunities for rural Willamette Valley communities.

Sincerely.

Curtis Cude,

Environmental Public Health Section Manager Center for Prevention & Health Promotion Public Health Division, Oregon Health Authority

# Attachment E

Justification For Requested Waiver of the \$200,000 Limit For Site-Specific Assessment

#### **Justification for Additional Funding Request**

Linn County is requesting a waiver of the \$200,000 site-specific assessment limit for the 400-acre Former Wood Products Manufacturing and Aggregate Mining property located in Sweet Home, Oregon. Linn County is requesting \$350,000 in site-specific funding.

#### **Site Description**

A 160-acre portion of the site historically was utilized for wood products manufacturing. The sawmill that formerly operated on the site was closed in 1989, and the plywood mill that operated on the site closed a few years later. These closures resulted in the loss of several hundred jobs. Small scale lumber remanufacturing continued at the site until 2009, but employed fewer than 40 workers. A 240-acre portion of the site historically was utilized for aggregated mining. Aggregate mining operations began in the 1940s and ended in 2003 and included an asphalt batch plant, redi-mix plant, and truck shop. Linn County acquired the property through tax foreclosure in

#### Why Assessment Costs Exceed the Funding Limit

Wood products manufacturing and aggregate mining operations occurred at the site for approximately 60 years. Common contaminants associated with these operations include 1) leaking tanks used for fueling running stock or the asphalt batch plant, 2) releases of hydraulic oil associated with extensive use of hydraulic equipment in mill operations, 3) releases of wood preservatives applied to finished lumber, 4) solvent releases associated with degreasing operations that were part of running stock and stationary equipment maintenance, and 5) asbestos and lead-based paint associated with buildings. Limited assessment of a few discreet areas of the site was conducted by prior owners. These assessments have confirmed multiple areas of concern, including a pentachlorophenol release associated with a former sawmill spray booth impacting soil, a hydraulic oil release associated with the former debarker impacting soil and log pond sediments, and a diesel release in the former asphalt batch plant area. The vast majority of the site has not been assessed. The Oregon Department of Environmental Quality (DEQ) has identified nine additional potential areas of concern requiring assessment. In order to complete assessment in the spray booth, debarker and asphalt batch plant areas, and in the nine other areas that the DEQ believes warrant assessment, an estimated \$350,000 in funding is required.

#### **Circumstances that Justify the Extra Costs**

Linn County's 2012-2013 budget included cuts of 44.25 full-time equivalent positions, a staffing reduction of nearly 7%. The County's 2013-2014 budget included cuts of 7.74 full time equivalent positions. The budget includes no major capital improvement projects. As a subset of Linn County, economic conditions are even worse in Sweet Home, with an unemployment rate of 10.4%. High local unemployment has had a significant negative impact on tax revenues available to Linn County and Sweet Home, and a long list of socioeconomic impacts.

The size of the site and its long history of manufacturing use justify the waiver of funding limits. Much of the site was occupied by various wood products manufacturing and aggregate mining infrastructure. Hydraulic oil, diesel, and pentachlorophenol releases have been documented, but more than 90% of the site has not undergone any assessment. The need to better delineate known contamination, and assess the vast expanses of the site that have never been assessed, justifies the additional funding requested.

# Attachment F

**Other Factors Checklist** 

# Appendix 3 Other Factors Checklist

Name of Applicant:	Linn	Count	<u>y, Oregon</u>

Please identify (with an X) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page#
x	Community population is 10,000 or less	2
	Federally recognized Indian tribe	
	United States territory	
	Applicant will assist a Tribe or territory	
	Targeted brownfield sites are impacted by mine-scarred land	
	Targeted brownfield sites are contaminated with controlled substances	
	Recent natural disaster(s) (2006 or later) occurred within community, causing significant community economic and environmental distress	
$\boldsymbol{x}$	Project is primarily focusing on Phase II assessments.	7-8
x	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation	8-9
x	Community experienced manufacturing plant closure(s) (2008 or later) tied to the targeted brownfield sites or project area, including communities experiencing auto plant closures due to bankruptcy or economic disruptions.	1
	Recent (2008 or later) significant economic disruption ( <u>unrelated</u> to a natural disaster or manufacturing/auto plant closure) has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	
	Applicant is a recipient or a core partner of a HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant that is directly tied to the project area, and can demonstrate that funding from a PSC grant has or will benefit the project area. To be considered, applicant must attach documentation which demonstrates this connection to a HUD-DOT-EPA PSC grant.	
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant	
	Community is implementing green remediation plans.	· · · · · · · · · · · · · · · · · · ·
	Climate Change	